

# LANE POWELL PC

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March 23, 2005

## VIA FACSIMILE/MAIL

Law Offices

James B. King, Esq.  
Keefe King & Bowman, PS  
601 West Main, Suite 1102  
Spokane, WA 99201-0625

**Re: Zlotnick v. Workland & Witherspoon, et al.  
Our File No. 119,488.0001**

Suite 4100  
1420 Fifth Avenue  
Seattle, WA  
98101

(206) 223-7000

Facsimile:  
(206) 223-7107

www.lanepowell.com

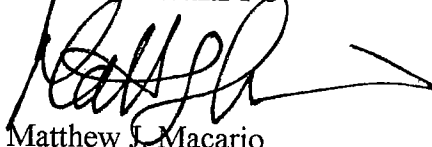
Dear Jim:

As you may know, your assistant contacted me yesterday morning to advise that she was striking the hearing you scheduled on defendants' motion to continue, because you were in trial and unreachable. I have attempted to reach you on multiple occasions without success to discuss your motion and other issues. Now, it seems that another two weeks will pass before the new hearing date.

As I expressed to you during our last telephone conversation, the delays are very frustrating, and continued delays are not acceptable to the plaintiff. We must proceed with discovery on this case. While we are sensitive to the challenges posed by Mr. Lipsker's illness, and your trial schedule, we are aware of no reason why the discovery of the law firm defendant, Workland & Witherspoon, cannot proceed at this time. We served you with written discovery to Mr. Lipsker and Workland & Witherspoon in January, and answers to that discovery are now almost one month overdue. Please contact me before Monday, March 28, 2005 to discuss this overdue discovery. If we do not hear from you before that date, we will have no choice but to move to compel.

Very truly yours,

LANE POWELL PC



Matthew J. Macario

MJM:mjm

cc: Mr. Albert M. Zlotnick  
James B. Stoetzer, Esq.  
119488.0001/1185103.1

Anchorage, AK  
Olympia, WA  
Portland, OR  
Seattle, WA  
London, England

James B. King, Esq.  
March 23, 2005  
Page 2

bcc: David B. Zlotnick, Esq.

119488.0001/1185103.1

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**FACSIMILE COVER PAGE**

**Date:** March 23, 2005

**Client Number:**

119444.1

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2005 MAR 23 PM 4 19

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**Re:** Zlotnick v. Workland & Witherspoon, et al.

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**Comments:**

Please see attached letter.

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